

DETERMINATION OF NON-SIGNIFICANCE

PROPONENT: Gellatly Vegetation Management
LOCATION OF PROPOSAL: 6257 164th Avenue SE
DESCRIPTION OF PROPOSAL: The applicant requests a Critical Areas Land Use Permit for vegetation management in a stream buffer from a Type N stream. The proposal includes removal of nonnative shrubs and their replacement with native riparian plants.
FILE NUMBERS: 6257 164 th Avenue SE PLANNER: Michael N Paine
The Environmental Coordinator of the City of Bellevue has determined that this proposal does not have a probable significant adverse impact upon the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.21C.030(2)(C). This decision was made after the Bellevue Environmental Coordinator reviewed the completed environmental checklist and information filed with the Land Use Division of the Development Services Department. This information is available to the public on request.
There is no comment period for this DNS. There is a 14-day appeal period. Only persons who submitted written comments before the DNS was issued may appeal the decision. A written appeal must be filed in the City Clerk's office by 5:00 p.m. on This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS. There is a 14-day appeal period. Only persons who submitted written comments before the DNS was issued may appeal the decision. A written appeal must be filed in the City Clerk's Office by 5 p.m. on 6/4/2015 This DNS is issued under WAC 197-11-340(2) and is subject to a 14-day comment period from the date below. Comments must be submitted by 5 p.m. on This DNS is also subject to appeal. A written appeal must be filed in the City Clerk's Office by 5:00 p.m. on
This DNS may be withdrawn at any time if the proposal is modified so as to have significant adverse environmental impacts; if there is significant new information indicating a proposals probable significant adverse environmental impacts (unless a non-exempt license has been issued if the proposal is a private project): or if the DNS was procured by misrepresentation or lack of material disclosure. Live of the DNS was procured by misrepresentation or lack of material disclosure. Date
OTHERS TO RECEIVE THIS DOCUMENT: State Department of Fish and Wildlife / Stewart.Reinbold@dfw.gov; Christa.Heller@dfw.wa.gov; State Department of Ecology, Shoreline Planner N.W. Region / Jobu461@ecy.wa.gov; sepaunit@ecy.wa.gov Army Corps of Engineers Susan.M.Powell@nws02.usace.army.mil Attorney General ecyolyef@atg.wa.gov Muckleshoot Indian Tribe Karen.Walter@muckleshoot.nsn.us; Fisheries.fileroom@muckleshoot.nsn.us



Proposal Name:

Gellatly Vegetation Management

Proposal Address:

6257 164th Avenue SE

Proposal Description:

The applicant requests a Critical Areas Land Use Permit for vegetation management in a stream buffer from a Type N stream. The proposal includes removal of nonnative shrubs and their replacement with native riparian plants.

File Number:

15-108111-LO

Applicant:

Robert Gellatly

Decisions Included:

Critical Areas Land Use Permit (Process II. LUC 20.30P)

Planner:

Michael Paine, Environmental Planning Manager

State Environmental Policy Act Threshold Determination:

Determination of Non-Significance

Carol V. Helland, Environmental Coordinator

Development Services Department

Director's Decision:

Approval with Conditions

Carol V. Helland, Land Use Director

Development Services Department

Application Date:

April 1, 2015

Notice of Application Publication Date:

- May 7, 2015

Decision Publication Date:

May 21, 2015

Project/SEPA Appeal Deadline:

June 4, 2015

For information on how to appeal a proposal, visit Development Services Center at City Hall or call (425) 452-6800. Comments on State Environmental Policy Act (SEPA) Determinations can be made with or without appealing the proposal within the noted comment period for a SEPA Determination. Appeal of the Decision must be received in the City's Clerk's Office by 5 PM on the date noted for appeal of the decision.

I. Proposal Description and Context

The applicant is proposing to manage vegetation within a stream buffer critical area on their property located at 6257 164th Avenue SE. The property is located in the Newcastle Subarea in the Lakemont Woods Division 2. The vegetation management plan will likely enhance habitat values while protecting the functions and values of the riparian buffer from a Type N stream.



Figure 1: Site aerial

/ A \

II. Vegetation Management Plan Performance Standards LUC 20.25H.055.C.3.v.i

(A)	is the vegetation Management Plan prepared by a qualified professional?
Yes ⊠	or No □

Describe: The applicant contracted with Williamson Landscape Architecture, LLC and EcoPacific to prepare a vegetation management plan.

(B) Does the Vegetation Management Plan include the following?
 (1) A description of existing site conditions, including existing critical area functions and values;
 Yes ☒ or No ☐

Describe: The plan describes the site conditions, including the slope, aspect and vegetation communities. The plan also discusses observations of wildlife use, and that no significant habitat features exist.

(2) A site history;

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15-108111-LO	_
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Yes ⊠ or No □			
Describe: The plan describes past vegetation restoration efforts that have occurred on the slope			
and on neighboring properties.			
(3) A discussion of the plan objectives;			
Yes ⊠ or No □			
Describe: The plan lays out six management objectives. In summary they include:			
Remove selected non-native shrubs and replace with native riparian plants			
 Increase native plant density within the buffer area by installing an assortment of native 			
trees, shrubs, and groundcovers			
 Reduce the coverage and opportunity for noxious weed species to expand within the buffer 			
area by removing such species			
Maintain existing habitat characteristics within the buffer area by leaving in any existing			
fallen logs, large woody debris, or branch piles			
 Successfully establish installed native plants species and minimize noxious weeds species to 			
maintain the quality of the riparian habitat within the stream buffer			
 Ensure 80 percent survival of installed plants after the third year following installation 			
Ensure less than 10 percent coverage of noxious weeds species within planted buffer area			
(4) A description of all sensitive features;			
Yes ⊠ or No □			
Describe: The stream and buffer are the most sensitive area and are well described in the plan.			
(5) Identification of soils, existing vegetation, and habitat associated with species of local importance present on the site; Yes ☒ or No ☐			
Describe: The plan identifies the existing vegetation and the presence of habitat associated with			
species of local importance. The site fits within a larger spatial context of a continuous natural			
wooded riparian corridor that extends about 1,400 feet to Lewis Creek Park.			
(6) Allowed work windows;			
Yes ⊠ or No □			
Describe: No work window required.			
(7) A clear delineation of the area within which clearing and other vegetation management			
practices are allowed under the plan; and			
Yes ⊠ or No □			
Describe: The vegetation management plan includes a detailed site and planting plan that will be			
mplemented immediately following the proposed removals.			

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(8) Short- and long-term management prescriptions, including characterization of trees and vegetation to be removed, and restoration and revegetation plans with native species, including native species with a lower growth habit. Such restoration and revegetation plans shall demonstrate that the proposed Vegetation Management Plan will not significantly diminish the functions and values of the critical area or alter the forest and habitat characteristics of the site over time. Yes ⊠ or No □ Describe: See discussion above under Item 3 above. Would any proposed tree removal result in a significant impact to habitat associated with (C) species of local importance? Yes □ or **No** ☒ **Describe:** Only non-native tree species are targeted for removal. If yes, can the impacted function be replaced elsewhere within the management area subject to the plan? Yes □ or **No** ☒ Describe: Not applicable, since the plan will enhance wildlife habitat through the planting native species, leaving brush piles and woody debris and increasing species diversity on the site. In no event may a tree or vegetation which is an active nest site for a species of local importance be removed pursuant to this subsection. Is the area under application subject to any applicable neighborhood restrictive covenants that (D) address view preservation or vegetation management? The existence of and provisions of neighborhood restrictive covenants shall not be entitled to any more or less weight than other reports and materials in the record. Yes □ or **No** ☒ If yes, describe: III. Public Notice and Comment April 1, 2015 Application Date: Public Notice (500 feet): May 7, 2015 May 21, 2015 Minimum Comment Period:

The Notice of Application for this project was published in the City of Bellevue weekly permit bulletin on May 7, 2015. It was mailed to property owners within 500 feet of the project site. No comments have been received from the public during the notice period.

IV. State Environmental Policy Act (SEPA)

The environmental review indicates no probability of significant adverse environmental impacts occurring as a result of the proposal. The attached Environmental Checklist submitted with the application adequately discloses expected environmental impacts associated with the project. The City codes and requirements, including the Clear and Grade Code, Utility Code, Land Use Code, Noise Ordinance, Building Code and other construction codes are expected to mitigate potential environmental impacts. Therefore, issuance of a Determination of Non-Significance (DNS) is the appropriate threshold determination under the State Environmental Policy Act (SEPA) requirements.

V. Critical Areas Land Use Permit Decision Criteria LUC 20.30P.140

The Dir	rector may approve or approve with modifications an application for a Critical Areas Land Use if:
Α.	The proposal obtains all other permits required by the Land Use Code; and Yes ☒ or No ☐ Describe: The applicant is required to obtain a Clearing and Grading in Critical Areas (GJ) permit to perform the proposed vegetation management.
B.	The proposal utilizes to the maximum extent possible the best available construction, design and development techniques which result in the least impact on the critical area and critical area buffer; and Yes 🗵 or No 🗆 Describe: The proposed vegetation management plan was developed by a qualified professional and describes the best available techniques for planting native trees and shrubs and sustaining a native landscape.
C.	The proposal incorporates the performance standards of Part 20.25H LUC to the maximum extent applicable; and Yes ☒ or No ☐ Describe: As discussed in Section II above, the applicant has complied with the performance standards for vegetation management within a riparian buffer.
D.	The proposal will be served by adequate public facilities including streets, fire protection, and utilities; and Yes ☒ or No ☐ Describe: The site is currently within the City of Bellevue and is served by adequate public facilities. Nothing in the proposal will increase the need for public services at the property.

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E. The proposal includes a mitigation or restoration plan consistent with the requirements of LUC 20.25H.210; except that a proposal to modify or remove vegetation pursuant to an approved Vegetation Management Plan under LUC 20.25H.055.C.3.i shall not require a mitigation or restoration plan; and

Yes ⊠ or No □

Describe: The proposal includes a preliminary plan to modify and remove vegetation, as well as plant native trees, shrubs and ground cover.

F. The proposal complies with other applicable requirements of this code.

Yes ⊠ or No □

Describe: The applicant has complied with the code by requesting Critical Areas Land Use Permit approval. The applicant shall also apply for and obtain a clearing and grading permit to carry out the proposed vegetation management.

VI. Conclusion and Decision

After conducting the various administrative reviews associated with this proposal, including Land Use Code consistency, SEPA, City Code and Standard compliance reviews, the Director of the Development Services Department does hereby **approve with conditions** the vegetation management plan within the steep slope critical area and critical area buffer at 610 97th Place SE.

Note- Expiration of Approval: In accordance with LUC 20.30P.150 a Critical Areas Land Use Permit automatically expires and is void if the applicant fails to file for a Clearing and Grading Permit or other necessary development permits within one year of the effective date of the approval.

VII. Conditions of Approval

The applicant shall comply with all applicable Bellevue City Codes and Ordinances including but not limited to:

Applicable Ordinances	Contact Person
Clearing and Grading Code- BCC 23.76	Savina Uzunow, 425-452-7860
Land Use Code- BCC 20.25H	Michael Paine, 425-452-2739
Noise Control- BCC 9.18	Michael Paine, 425-452-2739

The following conditions are imposed under the Bellevue City Code or SEPA authority referenced:

The following conditions are imposed under the Bellevue City Code or SEPA authority referenced:

1. Clearing and Grading Permit Required: Approval of this Critical Areas Land Use Permit does not constitute an approval of a grading, building, or utility permit. To ensure execution of the required performance standards and required mitigation planting within the critical area buffer the Applicant shall apply for a clearing and grading permit to install required mitigation and monitor performance.

Authority:

Land Use Code 20.30P.140

Reviewer:

Michael Paine, Development Services Department

2. Final Mitigation Plan Required: The applicant shall submit, in concert with a clearing and grading permit, a final planting plan, prepared by a qualified professional and conforming to the requirements of LUC 20.25H.220 (Restoration Plan Requirements) that documents the proposed restoration proposal in the stream buffer.

Authority:

Land Use Code 20.25H.210 and 20.30P

Reviewer:

Michael Paine, Development Services Department

3. Temporary Irrigation Required: The mitigation and restoration plan shall include provision for temporary irrigation sufficient to guarantee establishment success of all mitigation and restoration areas.

Authority:

Land Use Code 20.25H.210

Reviewer:

Michael Paine, Development Services Department

4. Land Use Inspection Required: Inspection of the required mitigation planting must be completed by the land use planner as part of the final inspection of the clearing and grading permit. See how to request an inspection at:

http://www.bellevuewa.gov/schedule an inspection.htm

Authority:

Land Use Code 20.25H.210

Reviewer:

Michael Paine, Development Services Department

5. Maintenance and Monitoring: Any planting area outlined in the mitigation plan shall be maintained and monitored for a total of five (5) years. Annual monitoring reports must to be submitted to the City of Bellevue's Land Use Division for five years at the end of each growing season. Photos from designated photo points suggested by the applicant and approved by the City shall be included in the monitoring reports to document continued success. The monitoring may be discontinued after three years if, in the opinion of the Department, the long-term success of the mitigation is assured. Due to the relatively small size of this restoration effort, the following simple schedule and performance standards apply and are evaluated in the report for each year:

Year 1 (from date of plant installation)

- 100% survival of all installed plants and/or replanting in following dormant season to reestablish 100%
- 0% coverage of invasive plants in planting area

Year 2 (from date of plant installation)

- At least 90% survival of all installed material
- Less than 5% coverage of planting area by invasive species or non-native/ornamental vegetation

Year 3, 4, & 5 (from date of plant installation)

- At least 85% survival of all installed material
- At least 35% (Yr3), 50% (Yr4), 70% (Yr5) coverage of the planting area by native plants in each year respectively
- Less than 5% coverage by invasive species or non-native/ornamental vegetation

The reports can be sent to Michael Paine at mpaine@bellevuewa.gov or to the address below: Environmental Planning Manager

Development Services Department

City of Bellevue

PO Box 90012

Bellevue, WA 98009-9012

Authority:

Land Use Code 20.25H.220.D

Reviewer:

Michael Paine, Development Services Department

6. Dark Sky Lighting Required: Any lighting associated with this proposal shall be limited to the minimum necessary and constructed and installed in such a manner that all light emitted by the luminaire, either directly from the lamp or a diffusing element, or indirectly by reflection or refraction from any part of the luminaire, is projected below the horizontal plane through the luminaire's lowest light-emitting part.

Authority:

Land Use Code 20.25H.080

Reviewer:

Michael Paine, Development Services Department

7. Noise related to construction: Noise from construction is exempt from the provisions of BCC 9.18 between the hours of 7 am to 6 pm Monday through Friday and 9 am to 6 pm on Saturdays, except for Federal holidays and as further defined by the Bellevue City Code. Noise emanating from construction is prohibited on Sundays or legal holidays unless expanded hours of operation are specifically authorized in advance. Requests for construction hour extension must be done in

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advance with submittal of a construction noise expanded exempt hours permit at least one week prior to the date the specific exemption is required.

Authority:

Bellevue City Code 9.18

Reviewer:

Michael Paine, Development Services Department

Personal fix will

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BACKGROUND INFORMATION

Property Owner: Robert and Susan Gellatly

Proponent: Robert and Susan Gellatly

Contact Person: Bill Williamson, Permit Coordinator / Landscape Architect

(If different from the owner. All questions and correspondence will be directed to the individual listed.)

7331 52nd Ave. NE

Address: Seattle, WA 98115

Phone: (206) 784-7996

Proposal Title: Gellatly Stream Buffer Revegetation

Proposal Location: 6257 164th Ave. SE 98006

(Street address and nearest cross street or intersection) Provide a legal description if available.

Please attach an 8 1/2" x 11" vicinity map that accurately locates the proposal site.

Give an accurate, brief description of the proposal's scope and nature:

1. General description: Remove existing aborvitae hedge and English holly shrub and replace with native vegetation within a stream buffer zone.

2. Acreage of site: .73 acres

3. Number of dwelling units/buildings to be demolished: N/A

4. Number of dwelling units/buildings to be constructed: N/A

5. Square footage of buildings to be demolished: N/A

6. Square footage of buildings to be constructed: N/A

7. Quantity of earth movement (in cubic yards): N/A

8. Proposed land use: No change in land use.

9. Design features, including building height, number of stories and proposed exterior materials: See plan set

10. Other

Estimated date of completion of the proposal or timing of phasing:

Spring 2015. No clearing to occur during the rainy season (October 1 through April 30) without written authorization of Bellevue Development Services Department.

Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

None

H18/2017

List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.			
Critical Areas Report / Vegetation Management Plan			
Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. List dates applied for and file numbers, if known. None			
List any government approvals or permits that will be needed for your proposal, if known. If permits have been applied for, list application date and file numbers, if known. Critical Areas Land Use Permit Clear and Grade Permit			
Please provide one or more of the following exhibits, if applicable to your proposal. (Please check appropriate box(es) for exhibits submitted with your proposal):			
Land Use Reclassification (rezone) Map of existing and proposed zoning			
Preliminary Plat or Planned Unit Development Preliminary plat map			
Clearing & Grading Permit Plan of existing and proposed grading Development plans			
Building Permit (or Design Review) Site plan Clearing & grading plan			
Shoreline Management Permit Site plan			
A. ENVIRONMENTAL ELEMENTS			
1. Earth			
a. General description of the site: Flat 🗸 Rolling 🗌 Hilly 📗 Steep slopes 📗 Mountains 🔲 Other			
b. What is the steepest slope on the site (approximate percent slope)? 33%			
c. What general types of soil are found on the site (for example, clay, sand, gravel, peat, and muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.			
Alderwood gravelly sandy loam (NRCS Web Soil Survey)			
d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. None			

mm)

Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source
of fill.

None other than surface bark mulch around new plantings

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
 - Erosion will be controlled through implementation of BMPs in clear and grade permit.
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

No change

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

BMPs will include installation of a silt curtain between the planting area and stream channel, minimizing exposed soil areas, and prompt planting and mulching.

2. AIR

a. What types of emissions to the air would result from the proposal (i.e. dust, automobile odors, and industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

None other than temporary emissions from landscape worker vehicles and hand-operated landscape equipment.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.
 None
- c. Proposed measures to reduce or control emissions or other impacts to the air, if any:

Vehicles will utilize standard emission control devices required by law.

3. WATER

a. Surface

(1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Site is within 50 ft buffer of a small Type N stream - an ephemeral headwater tributary within Lewis Creek drainage basin.

(2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If Yes, please describe and attach available plans.

Yes. The work will include planting within the 50 ft stream buffer, as close as 13 feet from the top of the stream bank. See site plans.

ML1 8 12015

		Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.
	(4) No	Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
	(5)	Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
	No	
	(6)	Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.
	No	
b.	Ground	
	(1)	Will ground water be withdrawn, or will water be discharged to ground water? Give general description.
	No	
	(2)	Describe waste material that will be discharged into the ground from septic tanks or other sources if any (for example: Domestic sewage; industrial, containing the following chemicals; agricultural; etc.) Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.
	Nor	e e
c.	Water R	unoff (Including storm water)
	(Describe the source of runoff (including storm water) and method of collection and disposal, if any include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Wil stone

(2) Could waste materials enter ground or surface waters? If so, generally describe.

None likely - with the exception of accidental fuel spills from landscape equipment.

No change. Rainfall will be infiltrated locally.

	Standard BMPs specified in clear and grade permit.	
4.	Plants	
	a. Check or circle types of vegetation found on the site:	
	✓ deciduous tree: alder, maple, aspen, other	
	✓ evergreen tree: fir, cedar, pine, other	
	✓ shrubs	
	☑ grass	
	pasture	
	Crop or grain	
	wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other	
	water plants: water lily, eelgrass, milfoil, other	
	other types of vegetation	
	on a type of regulation	
	b. What kind and amount of vegetation will be removed or altered?	
	One arborvitae hedge and one English holly shrub.	
	c. List threatened or endangered species known to be on or near the site.	
	None	
	d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the	
	site, if any:	
	Replacement with native trees, shrubs and groundcover. See site plans	
5.	ANIMALS	
	 a. Check or circle any birds and animals which have been observed on or near the site or are known to be o or near the site: 	n
	Birds: hawk, heron, eagle, songbirds, other:	
	Mammals: deer, bear, elk, beaver, other:	
	Fish: bass, salmon, trout, herring, shellfish, other:	

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

	b. List any threatened or endangered species known to be on or near the site.
	None
	c. Is the site part of a migration route? If so, explain. Loca ted on hacule Flyword
	No
	d. Proposed measures to preserve or enhance wildlife, if any:
	None Native planets proposed will exchance.
6.	Energy and Natural Resources
	a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy need? Describe whether it will be used for heating, manufacturing, etc.
	The completed project will require no energy.
	b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.
	No

None

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

c. What kinds of energy conservation features are included in the plans of the proposal? List other proposed

None

(1) Describe special emergency services that might be required. None

measures to reduce or control energy impacts, if any:

(2) Proposed measures to reduce or control environmental health hazards, if any.

None

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		1		
b.	N	0	0	0

(1) What types of noise exist in the area which may affect your project (for example, traffic, equipment, operation, other)?

Existing noise sources include minor vehicle traffic on 164th Ave SE.

(2) What types and levels of noise would be created by or associated with the project on a short-term or long-term basis (for example, traffic, construction, operation, other)? Indicate what hours noise would come from the site.

None

(3) Proposed measures to reduce or control noise impacts, if any:

None

Constanction Noise mitigated by BCL. 9-18

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties?

Residential

b. Has the site been used for agriculture? If so, describe.

No

Describe any structures on the site.

Single family residence, driveway, and patio/sport court.

d. Will any structures be demolished? If so, what?

e. What is the current zoning classification of the site?

R-1 Single-Family Residential Estate

f. What is the current comprehensive plan designation of the site?

SF-L Single-family Low-density

g. If applicable, what is the current shoreline master program designation of the site?

N/A

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

A portion of the site lies within a stream critical area buffer.

I. Approximately how many people would reside or work in the completed project?

None except existing residents

j. Approximately how many people would the completed project displace?

None

	1	None
	i.	Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:
	N	None
9.	Housi	ing
	a.	Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
	N	lone
	b.	Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.
	N	lone
	c.	Proposed measures to reduce or control housing impacts, if any:
	N	one
10.	Aestl	netics
	a.	What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?
		o structures proposed
	b.	What views in the immediate vicinity would be altered or obstructed?
		one
	C.	Proposed measures to reduce or control aesthetic impacts, if any:
	N	one

k. Proposed measures to avoid or reduce displacement impacts, if any:

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? None

b. Could light or glare from the finished project be a safety hazard or interfere with views?

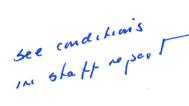
No

c. What existing off-site sources of light or glare may affect your proposal?

No

d. Proposed measures to reduce or control light or glare impacts, if any:

None



12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity? None

b. Would the proposed project displace any existing recreational uses? If so, describe.

No

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None

13. Historic and Cultural Preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No

b. Generally describe any landmarks or evidence of historic, archeological, scientific, or cultural importance known to be on or next to the site.

None

c. Proposed measures to reduce or control impacts, if any:

None

14. Transportation

 a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

164th Ave. SE

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop? Unknown
- c. How many parking spaces would be completed project have? How many would the project eliminate? No change

2/18 /2018 ht. d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally

No

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

None

g. Proposed measures to reduce or control transportation impacts, if any:

None

15. Public Services

a. Would the project result in an increased need for the public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

No

b. Proposed measures to reduce or control direct impacts on public services, if any:

None

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

All residential utilities except septic system expected.

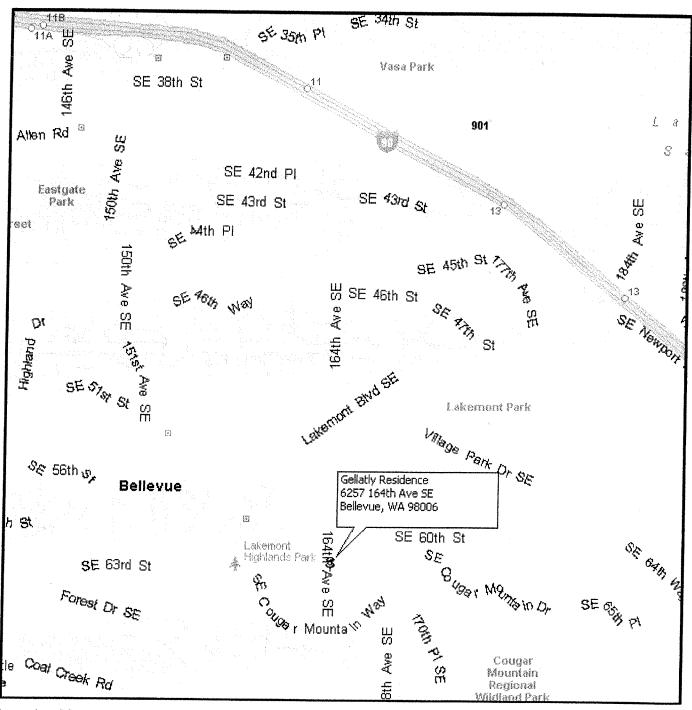
b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

No change

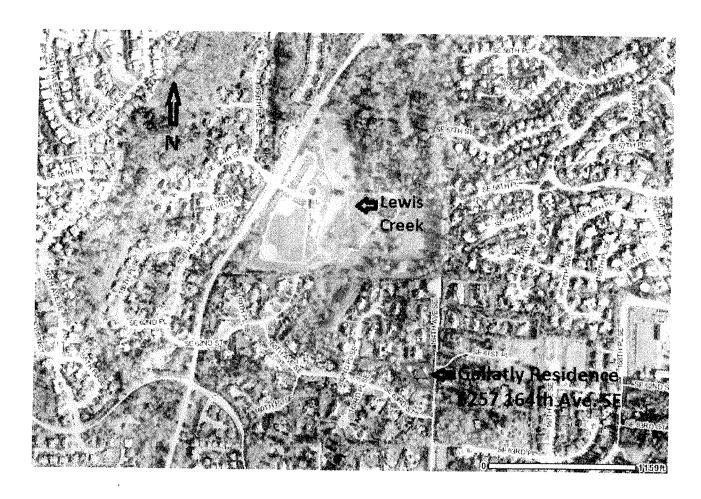
Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

MEMBER Date Submitted 03/30/2015
WILLIAMSON LANDSCATE ANCH, LLC



Location Map - Gellatly Revegetation Project





Location Photos – Gellatly Revegetation Project





March 30, 2015

Mr. Robert Gellatly 6257 164th Ave. SE Bellevue, WA 98006

Subject: Critical Areas Report / Vegetation Management Plan
Proposed Revegetation within Stream Buffer (Parcel 4139910150)

Dear Mr. Gellatly,

This document presents a focused Critical Areas Report and Vegetation Management Plan for a proposal to install native riparian plants adjacent to the single family residence at 6257 164th Ave. SE in Bellevue, WA. This work was conducted in response to a request for information from City of Bellevue staff on November 18, 2014 (attended by Bill Williamson, Project Manager / Landscape Architect) and will be used in support of an application for a Critical Areas Land Use Permit.

The focus of the study is protection of the 50-foot critical areas stream buffer associated with a 105 ft. section of a small tributary located in the headwaters of the Lewis Creek drainage basin. A portion of the Gellatly site lies within this designated buffer area, although the stream channel itself lies on an adjacent property (Parcel 4139910150 - 18356 SE 63rd St.).

On February 11, 2015, Tom Morrison, Senior Ecologist with *EcoPacific Environmental Services (EcoPacific)*, conducted a biological reconnaissance of the project site and vicinity. Information from this survey and from a routine search of City, State, and Federal environmental data sources is incorporated into the assessment below.

Project Description

The Gellatly property (Figures 1 and 2) is located within the Lakemont Woods subdivision of southeast Bellevue in an area of low to moderate density residential land use. The applicant's lot comprises 31,810 square feet and slopes gently from an elevation of about 963 ft. (NAVD 88) down about 939 ft. Notable structures on the site include a single family residence, driveway, and backyard patio/sport court.

As shown in the attached site plans (Attachment 1), the applicant wishes to remove a large non-native arborvitae hedge (*Thuja occidentalis*) and English holly shrub (*Ilex aquifolium*) located within the Gellatly buffer area and replace them with a mixture of native riparian trees, shrubs and ground cover. Significant trees within the buffer area include one Douglas fir (*Pseudotsuga menziesii*) and one red alder (*Alnus rubra*). Neither of these



Source: King County Imap

Figure 1. Project Vicinity – Gellatly Property



Figure 2. Riparian Corridor - Gellatly Property



significant trees will be removed and no other existing native vegetation on the Gellatly property or adjacent property (containing the stream channel) will be disturbed. A few existing non-native shrubs, including two ornamental rhododendrons, one azalea, and one flowering dogwood (*Cornus florida*), will be retained within the Gellatly portion of the buffer. The total area of new native plantings will be approximately 1,840 sq. ft.

Identification of Critical Areas and Buffers

The February *EcoPacific* site survey and subsequent review of City of Bellevue Critical Areas information (online map service) confirmed that the only critical area potentially affected by the project is a small stream channel located as close as 11 ft. from the south property boundary of the Gellatly site (see Figure 3). No geologic hazard areas (e.g., steep slopes), special flood hazard areas, wetlands, or known priority habitats associated with species of local importance were identified in the vicinity of the site.

The stream is fed by seepage and street stormwater runoff originating at 164th Ave. SE and extends a distance of about 1,400 ft. before reaching the main Lewis Creek stream channel in Lewis Creek Park. Over this distance, the stream flows through a narrow, wooded riparian corridor that lies between several developed residential properties. The 105 ft. stream section adjacent to the Gellatly site has not been formally typed but is expected to fit the classification of a "Type N" stream (i.e., non-fish bearing with connected surface flow) as defined in the City's land Use Code (20.25H.075). In previous investigations, most small tributary stream channels in headwaters of the Lewis Creek watershed have been given this designation (City of Bellevue 2009a, Watershed Company 2010a). Generally, a Type N channel is protected by a 50 ft. critical area buffer measured from the top-of-bank and this was confirmed at the informal pre-application meeting with City staff on November 18, 2014.

During the February 2, 2015 site survey, it was apparent that water flow within the stream channel adjacent to the Gellatly site would be considered "ephemeral" and closely associated with rainfall events. Maximum surface water discharge of about 2 gallons per minute was observed in the channel at about 10:00 a.m. By 3 p.m. there was no measurable surface flow and no discernable pools of water (over the length of the Gellatly property boundary) such as one might see in a more permanent "blue line" stream. According to the Applicant, the channel is dry throughout most of the year.

Stream Critical Area Functions and Habitat Values

The riparian corridor adjacent to the Gellatly site is forested with a mix of first- and second-growth trees. Native deciduous trees are mixed with conifers and there are patches of native shrubs and low density groundcover. Primary native tree species include red alder (*Alnus rubra*), cedar (*Thuja plicata*), big leaf maple (*Acer macrophyllum*) and Douglas fir (*Pseudotsuga menziesii*). Smaller native trees and shrubs include vine maple (*Acer circinatum*), red elderberry (*Sambucus recemosa*), indian plum (*Oemleria cerasiformis*), sword fern (*Polystichum minitum*), and salal (*Gaultheria shallon*).



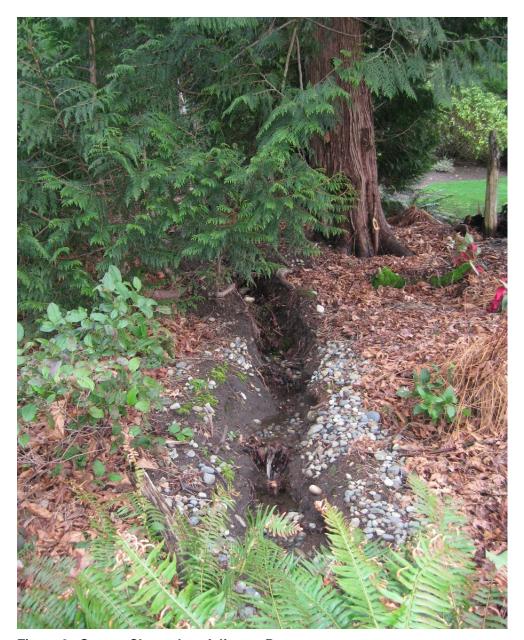


Figure 3. Stream Channel on Adjacent Property

Due to ongoing regular maintenance at the Gellatly site and the adjacent property, the stream corridor is relatively free of typical local invasive species such as ivy (*Hedera helix*), blackberry (*Rubus armeniacus*), hedge bindweed (*Convolvulus sepium*), and other herbaceous weeds. A few English holly shrubs (*Ilex aquifolium*) were evident but these have apparently not been allowed to spread.

The small, ephemeral stream channel does not provide direct habitat for fish and other aquatic organisms as these are not present in the vicinity. However, the riparian corridor and buffer area is expected to provide a number of potentially important habitat functions:



- The wooded area retains sediments, nutrients, pesticides, pathogens, and other pollutants that may be present in runoff, protecting downstream water quality.
- The wooded area provides shade to reduce solar exposure and regulate high ambient air temperatures, slowing or preventing increases in water temperature in stream headwaters.
- The roots of riparian plants hold soil and prevent erosion and sedimentation that may affect spawning success and/or feeding quality in downstream waters.
- The riparian area and buffer reduce the effects of flood flows by infiltration and by reducing and desynchronizing peak rates of runoff during high rainfall events.
- The riparian area has a shallow groundwater table that is augmented by infiltration of water through
 vegetation and soils containing high amounts of organic matter. This stored groundwater is then slowly
 released and forms an important function in maintaining baseflow in perennial downstream sections of
 Lewis Creek.
- Natural wooded corridors and buffers provide potential habitat (foraging, nesting, refuge, etc.) for native wildlife. Especially valuable is the multi- canopy forest structure with associated snags, downed logs, and brush piles.

In a larger spatial context, the Gellatly buffer area is a small component of a continuous natural wooded riparian corridor that extends about 1,400 ft. to Lewis Creek Park. This park is one of the larger areas containing natural field, stream and wetland habitats on southeast Bellevue. More than three-quarters of the 56-acre Lewis Creek Park remains in a natural state (Watershed Company 2010b).

The Lewis Creek Basin is the largest and most significant drainage basin in Bellevue flowing into Lake Sammamish (City of Bellevue 2015). Lower sections of Lewis Creek are known to support populations of cutthroat trout (*Oncorhynchus clarki*), coho (*O. kisutch*) and sockeye salmon (*O. nerka*), and late-run kokanee (*O. nerka*) (City of Bellevue 2009b).

Species of Local Importance

The City of Bellevue designates habitat associated with species of local importance as a critical area (LUC 20.25H.150.B). The current list of species of local importance in the LUC contains a number of bird, reptile, amphibian, and fish species. Given the location and on-site conditions, the Gellatly buffer area is unlikely to provide important habitat for any of the listed species. However, the wooded site could be used occasionally for foraging and/or perching by listed species such as red-tailed hawk (*Buteo jamaicensis*), merlin (*Falco columbarius*), Pileated woodpecker (*Dryocopus pileatus*), and Vaux's swift (*Chaetura vauxi*).



The only evidence of possible use by a listed bird species noted during the February 2, 2015 survey was a series of large rectangular woodpecker foraging holes in a small snag tree a little under 100 feet northwest of the Gellatly site (not within the proposed revegetation area). These holes could be the result of Pileated woodpecker feeding activity.

Assessment of Potential Risks or Impacts of Development

The project as proposed will result in minimal disturbance of soils and vegetation within the stream buffer area. The only notable vegetation removed will be a non-native arborvitae hedge and a potentially invasive non-native holly shrub (see site plans - Attachment 1). New native plantings would include approximately 1,840 sq. ft. of riparian trees, shrubs and groundcover. Also, the existing grass lawn area within the buffer would be reduced by about 171 sq. ft. The result of the project will be an increase in the density and quality of the riparian woodland within the Gellatly buffer area and this will generally improve local stream critical area functions and habitat values. All plant installation, maintenance, and monitoring will comply with an approved Vegetation Management Plan (see below) and the project will also be subject to the terms of a Bellevue Clearing and Grading Permit.

Vegetation Management Plan

Bellevue Land Use Code (LUC) Chapter 20.25H.055.C.3.i.vi permits vegetation replacement within a stream critical area buffer using an approved "Vegetation Management Plan". This report section provides the additional information necessary to demonstrate that proposed revegetation within Gellatly buffer area complies with requirements of the LUC.

The primary goal of proposed vegetation replacement is to replant areas impacted by removal of non-native vegetation and to generally improve the quality of riparian woodland habitat within the Gellatly portion of the stream buffer. A detailed revegetation plan as well as three (3) years of maintenance and monitoring is proposed to ensure the new vegetation is successfully established. Specific objectives and performance standards for the planting plan are described in detail on Attachment 1. Sheet L.3 and are outlined below:

Short-term objectives:

- Remove selected non-native shrubs and replace with native riparian plants as per the approved revegetation plan.
- Generally increase native plant density within the buffer area by installing an assortment of trees, shrubs and groundcover.
- Reduce the presence of and minimize the opportunity for noxious weed species expansions within the buffer area by removing such species as they are encountered during the revegetation project.



 Maintain existing habitat characteristics within the buffer area by leaving in any existing fallen logs, large woody debris, or branch piles.

Long-Term Objectives:

- Successfully establish installed native plant species and minimize noxious weed species to help maintain
 the quality of riparian habitat within the stream critical area buffer. This long-term objective will be
 considered achieved when the following has occurred:
 - 80% survival of installed plants after the third year following installation
 - Less than 10% coverage of noxious weed species within the planted buffer area.

The proposed revegetation plan is also designed to comply with standards for planting plan design, maintenance, and monitoring as outlined within the City of Bellevue's *Critical Areas Handbook* (Bellevue 2010). A full listing and description of specifications for the Gellatly buffer site are outlined in Attachment 1, Sheet L.3.

References

City of Bellevue. 2009a. *Final Report, City of Bellevue Stream Typing Inventory*. Prepared for City of Bellevue Utilities Department by The Watershed Company. May 20, 2009.

City of Bellevue. 2009b. Fish Use of Stream Drainage Basins. April 2009.

City of Bellevue. 2010. *Critical Areas Handbook*. Prepared for City of Bellevue Department of Development Services by The Watershed Company. 2010.

City of Bellevue. 2015. *Lewis Creek Basin and Land Use Fact Sheet*. Bellevue web page accessed 3/20/15. http://www.bellevuewa.gov/pdf/Utilities/10-LEWIS_CREEK.pdf

The Watershed Company. 2010a. Lewis Creek Park Wetland and Stream Inventory for the Vegetation Management Area. Letter report prepared for City of Bellevue Parks and Community Services. June 10, 2010.

The Watershed Company. 2010b. *Lewis Creek Park Vegetation Management Plan*. Prepared for City of Bellevue Parks and Community Services. March, 2010.



I hope this report meets your present needs. Please don't hesitate to contact me (425-417-3785, ecopacific@seanet.com) if you have any questions or I can be of further assistance.

Sincerely,

Tom O. Morrison

Principal Environmental Scientist

EcoPacific Environmental Services

TM:tm



ATTACHMENT 1

GELLATLY REVEGETATION PROJECT SITE PLANS

U

02468 12 16

24 FEET

PLANTING SPECIFICATIONS & DETAILS

Goals, Objectives and Performance Standards

The Gellatly project involves re-vegetation within a portion of the 50-foot Critical Areas stream buffer of a 105 ft. section of a small, ephemeral tributary located in the headwaters of the Lewis Creek drainage basin. The applicant will remove a large non-native arborvitae hedge (*Thuja occidentalis*) and English holly shrub (*Ilex aquifolium*) and replace them with a mixture of native riparian trees, shrubs and ground cover. Significant trees within the Gellatly buffer area include one Douglas fir (*Pseudotsuga menziesii*) and one red alder (*Alnus rubra*). Neither of these significant trees will be removed and no other existing native vegetation will be disturbed. The total area of new native plantings will be approximately 1,840 sq. ft.

All work shall be conducted in compliance with a Critical Areas Land Use Permit and Clearing and Grading Permit and shall meet or exceed appropriate standards for site preparation, installation, and maintenance/monitoring laid out in the City of Bellevue's Critical Area Handbook. Specific objectives and performance standards for the project are as follows:

Short-term objectives:

- Remove selected non-native shrubs and replace with native riparian plants as per the approved revegetation plan.
- Generally increase native plant density within the buffer area by installing an assortment of trees, shrubs and groundcover.
- Reduce the presence of and minimize the opportunity for noxious weed species expansions within the buffer area by removing such species as they are encountered during the re-vegetation project.
- Maintain existing habitat characteristics within the buffer area by leaving in any existing fallen logs, large woody debris, or branch piles.

Long-Term Objectives:

- Successfully establish installed native plant species and minimize noxious weed species to help maintain the quality of riparian habitat within the stream critical area buffer. This long-term objective will be considered achieved when the following has occurred:
 - 80% survival of installed plants after the
 - third year following installation
 Less than 10% coverage of noxious weed species within the planted buffer area

Responsibilities

Planting elements (plant removal and replacement) shall be implemented by a landscape contractor experienced with working within Critical Areas. Overall supervision of the project shall be carried out by the owner or his designated representative. Site inspections shall be conducted before and after planting; then ongoing monitoring shall be conducted by a qualified (> 5 yrs experience) restoration consultant (ecologist or landscape architect).

Landscape Preparation and Planting Procedures

- 1. Install reinforced silt fencing to protect the stream channel from migration of sediments from the site. The fence shall be located at least 2' upland of the top of the stream bank and remain in place until plantings are installed and exposed soil areas are stabilized.
- 2. All non-native, invasive vegetation (holly, blackberry, ivy, bindweed, creeping buttercup, etc.) within the Gellatly portion of the buffer zone shall be removed (manual methods) for offsite disposal.
- 3. Plant removal and site preparation should not result in the need for importing topsoil. If a small amount of imported soil is required, it shall be aged, weed free, and contain 10-20% organic matter by volume. Where it is possible, native soil shall be used for backfilling the bottom half of planting holes. Any compacted soils in the planting area shall be loosened.

- 4. No grading or major soil disturbance shall occur within the drip line of the existing significant trees. Installation of plant materials within these drip line areas shall use pit plantings or cuttings. The restoration consultant shall be notified if any large living root mass is discovered during site preparation.
- 5. If possible, conduct all clearing, plant removal and planting in dry weather conditions during the period from May 1 September 3. Contact the Bellevue Development Services Department if any work involving significant disturbance of site soils must be conducted outside of this period.
- 6. Plant materials shall be local genetic stock (Western WA, preferably Puget Sound lowlands), healthy, bushy, and true to size, name, and variety (nomenclature from *Flora of the Pacific Northwest* by Hitchcock and Cronquist, UW Press 1973 and/or *A Field Guide to the Common Wetland Plants of Western Washington & Northwestern Oregon*, ed. Sarah Spear Cooke, Seattle Audubon Society, 1997). All plants shall be free of damage and disease and shall be habituated to local outdoor conditions (i.e., hardened off). Plants in leaf shall be well foliated and of good color. Root systems shall be fibrous and free of dead or tightly balled roots.
- 7. Plant cuttings (if proposed) shall only be allowed from December through March. In other months, live rooted, ball-in-burlap, or container plants shall be used. Cuttings shall be at least .5" in diameter and have a minimum of 4 lateral buds above ground after planting. Cuttings must be fresh (<24 hrs. from cutting), kept moist, and have side branches cleanly removed and bark intact. Butt ends shall be cleanly cut at an angle for easy insertion and dipped in a plant rooting hormone prior to planting. A pilot hole of at least 18" shall be made prior to planting in dense and gravelly soils. Cuttings shall be inserted to a depth of at least 18", leaving a minimum of 30" extending above ground.
- 8. Plant spacing for listed species shall be somewhat random (naturalistic) and not in a regular grid pattern. Oncenter spacing in the plant list indicates the "average" spacing distance. Where groundcover species mixtures are specified, conspecifics should be planted in clusters of >5 plants to facilitate easy identification and weeding.
- 9. When planting, remove plant from container with rootball completely intact. If container stock is root-bound, slash roots vertically with a sharp knife along the outside of rootball a minimum of three (3) places before planting. If a plant has minor root damage, root-prune as necessary to remove broken or damaged roots.
- 10. When installing plants, water thoroughly midway through the backfill process to settle soil. Complete backfill at finished grade and ensure the plant is at proper alignment. Water plants again after backfill to settle soil; add additional backfill as necessary if roots become exposed. All plants shall be thoroughly watered within 24 hours after planting.
- 11. A 2-3" layer of compost amendment or wood chip mulch (no sawdust, course hog fuel, or high tannin containing species such as cedar) shall be placed around the base of each tree (36" diameter ring) and shrub (18" diameter ring) for erosion, weed control, and moisture retention. Wood chip mulch can also be used in open areas and pathways as desired. Mulch shall not touch stems or leaves of existing or installed plants.
- 12. The owner or landscape contractor shall have discretion to substitute alternative planting methods or materials (size, condition, spacing, etc.) following assessment of site-specific conditions. Substitution of different species, smaller size, or greater spacing shall not be allowed without prior approval of the restoration consultant. The consultant shall submit such proposed substitutions to the City for review and approval. Substantive changes shall be recorded upon completion of work
- 13. The landscape contractor shall guarantee survival of all plant materials for one growing season. However, he shall not be responsible for mortality or damage caused by unavoidable destruction by animal pests, or lack of proper maintenance (see below).

Irrigation

1. The owner shall install a temporary irrigation system or modify the existing in-ground system to provide for irrigation of the planted areas for at least 3 years.

- 2. The system shall be zoned to provide optimal pressure and uniformity of coverage, as well as separation for areas of full sun or shade and slopes in excess of 5%. The system shall be capable of providing 2 inches of water per week.
- 3. The watering protocol shall provide a minimum of 1-inch of water a week to installed plantings from July 1 to October 15 during the first two years following plant installation. Typically, the system should be programmed to provide ½-inch of water every 3 days during the first year. Irrigation rates shall be increased as necessary during periods of prolonged hot, dry weather to prevent plant mortality.

Maintenance and Monitoring

- 1. Maintenance and monitoring shall be the responsibility of the restoration consultant. Objectives and performance standards of the monitoring program are outlined above (see "Goals, Objectives, and Performance Standards"). The performance standards shall be used to judge the success of the installation over time. If performance standards are met at the end of Year 3, the site will then be deemed successful and any performance security funds will be eligible for release by the City of Bellevue.
- 2. An as-built plan (if necessary to document changes) and letter of completion shall be prepared by the restoration consultant and submitted to the City of Bellevue within one month of installation of plantings. The as-built plan shall include photos of the entire planting area and identify permanent photo point locations for future monitoring.
- 3. Monitoring shall take place once annually for 3 years, with reports submitted to the City at the end of years 1, 2, and 3 following City acceptance of the as-built plan. Monitoring visits should occur between July 1 and September 15. Monitoring reports should be submitted within one month of the field visit and should contain, at minimum, the following content:
- Visual assessment of the overall site.
- Counts of dead plants where mortality is significant in any monitoring year.
- Estimate of native shrub cover using the cover class method site-wide.
- Estimate of non-native, invasive weed cover using the cover class method site-wide.
- Tabulation of established native species, including both planted and volunteer species.
- Photographic documentation from at least two fixed reference points.
- Any intrusions into or clearing of the planting areas, vandalism, or other actions that impair the intended functions of the mitigation area.
- Recommendations for maintenance or repair of any portion of the mitigation areas.
- 4. If there is a significant problem with the restoration areas meeting performance standards, a contingency plan will be developed and implemented. Contingency plans can include, but are not limited to: soil amendment; additional plant installation; and plant substitutions of type, size, quantity, and location.
- 5. During the monitoring period, the owner shall allow periodic site inspections by resource agency staff or qualified individuals specified by these agencies. Agency monitors shall notify the owner and/or restoration consultant at least one week prior to the inspection.

6. Ongoing maintenance shall include the following:

- Care not to use chemical herbicides, fungicides, pesticides or phosphorus (P) fertilizer in the planting area or anywhere in the 50-foot stream buffer. If fertilizer is required, it shall be a P-free formulation such as "Lake Whatcom Blend" (Whatcom Farmer's Coop.) or "Scotts Turf Builder Phosphorus Free". Keep fertilizer in a weather-tight container while on site. Fertilizer can be applied only in years 2 and 3 and not in the first year. Note: The applicant must submit as part of the required Clearing and Grading Permit information regarding the use of pesticides, insecticides, and fertilizers in accordance with the City of Bellevue's Environmental Best Management Practices.
- Regular watering with care not to over water and cause soil erosion. Once plants are established (after one or two full growing seasons), little or no watering should be required.
- Weeding (at least twice yearly) to remove non-native and invasive species. Do not weed the area near the plant bases with string trimmer (weed whacker/weed eater). Native plants are easily damaged or killed, and weeds easily recover after trimming. Over the long term, allow natural colonization of other native species if such growth is not highly invasive.
- Replacement of plants as required.
- Replace mulch/amendment as necessary to maintain a minimum 2-inch-thick layer, retain soil moisture, and limit weeds.